

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

NATIONAL RIFLE ASSOCIATION OF AMERICA,

Plaintiff,

DECLARATION

-against-

18-cv-00566
(TJM/CFH)

ANDREW CUOMO, both individually and in his official capacity; MARIA T. VULLO, both individually and in her official capacity; and THE NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES.,

Defendants.

Tanisha Edwards, Esq., declares the following to be true and correct under penalty of perjury, pursuant to 28 U.S.C. § 1746:

1. I am employed by the Executive Chamber of the State of New York as Assistant Counsel to the Governor for Taxation and Financial Services. I respectfully submit this Declaration pursuant to the Court's Order of August 8, 2019 [Dkt. 121], specifically in regards to the Court's directive concerning the production of: 1) Documents concerning referrals of NRA-related matters to other government agencies [Dkt. 121 at pg. 27-30], and; 2) Documents and communications related to adverse actions against the NRA [Dkt 121 at pg. 49-50].

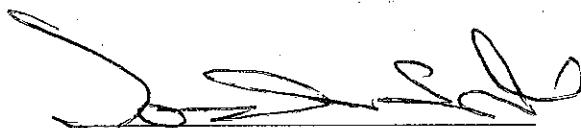
2. The Executive Chamber has undertaken a diligent search for records responsive to the demands at issue, more specifically Plaintiff's RFP1 -3, 5, 10-11, 19-23, 23(2), 24 and 25.

3. After a diligent search, and has already been represented to the Plaintiff in Governor Cuomo's discovery responses, there exist no documents relevant to referrals of matters

related to the NRA to other government agencies, beyond what has already been provided to the Plaintiff.

4. After a diligent search, and has already been represented to the Plaintiff in Governor Cuomo's discovery responses, there exist no documents relevant to adverse or enforcement actions against financial institutions doing business or potentially doing business with the NRA, other than Lockton, Chubb, and Lloyd's and beyond what has already been provided to the Plaintiff.

Dated: Albany, New York
August 20, 2019



TO: Sarah Rogers, Esq.
Brewer Attorneys & Counselors
750 Lexington Avenue, 14th Flr.
New York, NY 10022